

REMARKS

The Final Office Action dated April 6, 2007 contained a final rejection of claims 1-20. The Applicants have amended claims 1, 8 and 15. Claims 1-20 are in the case. Please consider the present amendment with the attached Request for Continued Examination (RCE) under 37 C.F.R. § 1.114. This amendment is in accordance with 37 C.F.R. § 1.114. Applicants respectfully request further examination and reconsideration in view of the above amendments.

The Final Office Action dated April 6, 2007 rejected claims 1-20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Adler (U.S. Patent Publication No. 2002/0169658) in view of Lindell (U.S. Patent No. 6,622,056).

The Applicants respectfully traverse this rejection based on the amendments to the claims and the arguments below.

In particular, the Applicants contend that combined references do not disclose, teach, or suggest all of the elements of the Applicants' newly amended claimed invention. For example, claims 1 and 15 now include an internode transit time table having internal demand nodes and terminal demand nodes, wherein the internode transit time table is configured to have data input into the transit time table consisting of statistical data associated with transit time between nodes and wherein the transit time data consists of values of a mean and standard deviation for the transit time by at least one of air, ground or sea.

In addition, claim 8 now includes a mean demand table and a standard deviation table, each configured to allow a user to enter mean and standard deviation values for a demand for each product, wherein the entered values correspond to a boundary condition for the supply chain analysis, a bill of materials table for parts, wherein a required number of parts for each product is entered by a user into the bill of materials table for translating the demand of the product into a parts demand and a materials for product table configured to track product forms and intermediate assemblies of products, wherein a part transforms a product from one form to another so that a part is associated with the product table that results from its incorporation.

In contrast, the combined references simply disclose a system and method for modeling and analyzing strategic business decisions (see Abstract of Alder) and a supply chain network control system (see Summary of Lindell). Although the combined references disclose systematic decision-making by synthesizing the conceptual strategic modeling technique of scenario-based planning (SBP) with concrete simulations of the scenario-based models, the combined references clearly are missing the Applicants' newly amended claimed features.

Specifically, the combined references are missing the internode transit time table having internal demand nodes and terminal demand nodes, wherein the internode transit time table is configured to have data input into the transit time table consisting of statistical data associated with transit time between nodes and wherein the transit time data consists of values of a mean and standard deviation for the transit time by at least one of air, ground or sea of claims 1 and 15.

Further, unlike the combined references, claim 8 now includes a mean demand table and a standard deviation table, each configured to allow a user to enter mean and standard deviation values for a demand for each product. The entered values correspond to a boundary condition for the supply chain analysis and a bill of materials table for parts is included so that a required number of parts for each product is entered by a user into the bill of materials table for translating the demand of the product into a parts demand. Also, a materials for product table is used to track product forms and intermediate assemblies of products when a part transforms a product from one form to another so that a part is associated with the product table that results from its incorporation.

Hence, since the combined references are missing features of the Applicants' claimed invention, the combined references cannot render the Applicants' invention obvious. This failure of the cited reference to disclose, suggest or provide motivation for the Applicants' claimed invention indicates a lack of a *prima facie* case of obviousness and, thus, the obviousness rejection should be withdrawn (MPEP 2143).

Last, with regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicant kindly requests the Examiner to telephone the Applicant's attorney at (818) 885-1575. Please note that all mail correspondence should continue to be directed to Hewlett Packard Company
Intellectual Property Administration
P.O. Box 272400
Fort Collins, CO 80527-2400

Respectfully submitted,
Dated: July 6, 2007



Edmond A. DeFrank
Reg. No. 37,814
Attorney for Applicant
(818) 885-1575 TEL
(818) 885-5750 FAX